

1 SCOTT N. SCHOOLS (SCBN 9990)  
 United States Attorney

2 MARK L. KROTOSKI (CSBN 138549)  
 3 Chief, Criminal Division

4 STEPHANIE M. HINDS (CSBN 154284)  
 Assistant United States Attorney

5 E-filing  
 6 450 Golden Gate Avenue, 9<sup>th</sup> Floor  
 San Francisco, CA 94102  
 Telephone: 415.436.6816  
 7 Facsimile: 415.436.6748  
 Email: [stephanie.hinds@usdoj.gov](mailto:stephanie.hinds@usdoj.gov)

ORIGINAL  
FILED

JUN 13 2007

RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

8 Attorneys for United States of America

MMC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

16 v.

17 1. 1997 LAMBORGHINI DIABLO, VIN  
 ZA9RU37P6VLA12636,  
 18 2. 2006 PORSCHE CAYENNE TURBO,  
 VIN WP1AC29P96LA91296,  
 19 3. \$8,692.42 IN FUNDS SEIZED FROM  
 COMMERCE BANK ACCOUNT  
 HELD IN THE NAME OF PSA, LLC.,  
 20 4. \$6,314.76 IN FUNDS SEIZED FROM  
 COMMERCE BANK ACCOUNT  
 HELD IN THE NAME OF  
 PHARMACY USA, LLC, AND  
 21 5. \$1,076,636.89 IN FUNDS SEIZED  
 FROM TD AMERITRADE ACCOUNT  
 HELD IN NAME OF CHRISTOPHER  
 22 NAPOLI,  
 23  
 24  
 25  
 26  
 27 Defendants.

15 (07) No. 07-  
 28 NOTICE OF FORFEITURE ACTION

1 A civil complaint seeking forfeiture pursuant to Title 18, United States Code, Section  
2 981(a) and Title 21, United States Code, Section 881(a)(6) was filed on June 13, 2007, in the  
3 United States District Court for the Northern District of California by the United States of  
4 America, plaintiff, against the *in rem* defendant funds and vehicles.

5 In order to contest forfeiture of the *in rem* defendant funds and vehicles, any person who  
6 asserts an interest in or right against the funds must file a verified statement identifying the  
7 interest or right within 35 days after the date of service of the complaint in accordance with Rule  
8 G(5) of the Supplemental Rules for Admiralty or Maritime and Asset Forfeiture Claims or within  
9 30 days after the date of final publication of the Notice of Forfeiture Action, whichever is earlier.  
10 Additionally, a claimant must serve and file an answer to the complaint or a motion under Rule  
11 12 of the Federal Rules of Civil Procedure within 20 days after filing the claim.

12 An agent, bailee or attorney must state the authority to file a statement of interest or right  
13 against the property on behalf of another.

14 Statements of interest and answers should be filed with the Office of the Clerk, United  
15 States District Court for the Northern District of California, 450 Golden Gate Avenue, 16<sup>th</sup> Floor,  
16 San Francisco, California 94102, and copies should be served on Stephanie M. Hinds, Assistant  
17 United States Attorney, 450 Golden Gate Avenue, 9<sup>th</sup> floor, San Francisco, California 94102.

18  
19 Respectfully submitted,

20 SCOTT N. SCHOOLS  
21 United States Attorney

22   
23 STEPHANIE M. HINDS  
24 Assistant United States Attorney  
25  
26  
27  
28

Dated: June 13, 2007